

# DISTRICT ATTORNEY KINGS COUNTY

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> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: SAMANTHA MEDINA

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

#### Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 04/03/2018, AGAINST MOS PUGH:

- FAIL TO SAFEGUARD DEPARTMENT TRAIN PASS METROCARD
- 2. MISSING DEPARTMENT TRAIN PASS METROCARD
- 3. FAIL TO NOTIFY IAB
- 4. FOUND DEPARTMENT TRAIN PASS METROCARD

CASE CLOSED ON 09/05/2018 ACTION TAKEN: A CD ISSUED.

## Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 10/1/2018, AGAINST MOS PUGH:

- 1. FAIL TO SAFEGUARD DEPARTMENT CELLULAR PHONE
- 2. MISSING DEPARTMENT CELLULAR PHONE
- FAIL TO NOTIFY IN A TIMELY MANNER IAB

CASE CLOSED ON 10/26/2018 ACTION TAKEN: A CD ISSUED.

#### Disclosure # 3:

ON 11/16/2018, MOS MEDINA, WAS ARRAIGNED IN NEW YORK COUNTY CRIMINAL COURT ON A MISDEMEANOR COMPLAINT UNDER DOCKET NO. 2018NY045000. ON 06/07/2019, THE CASE WAS DISPOSED WHEN OFFICER MEDINA PLED GUILTY TO V.T.L. 1192.1.

THE CHARGES WERE BASED ON THE FOLLOWING ALLEGATIONS OF FACT: ON 11/15/2018, MOS MEDINA, WHILE OFF-DUTY, WAS DRIVING A NISSAN SEDAN ON CHRISTOPHER STREET IN MANHATTAN, WHEN SHE COLLIDED WITH A PEDESTRIAN, FLIPPING HIM OVER AND CAUSING HIM SUBSTANTIAL PAIN. MOS MEDINA DROVE AWAY FROM THE SCENE WITHOUT STOPPING FOR SOME DISTANCE, PURSUED BY THE PEDESTRIAN, WHO ULTIMATELY SAT ON THE HOOD OF MOS MEDINA'S AUTOMOBILE TO PREVENT HER FURTHER FLIGHT. AT THE TIME OF THE DEFENDANT'S ARREST, SHE WAS OBSERVED TO HAVE GLASSY EYES, THE ODOR OF AN ALCOHOLIC BEVERAGE ON HER BREATH, AND SLURRED SPEECH.

IN REGARD TO THE ABOVE INCIDENT, THE NYPD FILED THE FOLLOWING ALLEGATIONS AGAINST MOS MEDINA:

- 1. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF-DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS DID WRONGFULLY OPERATE A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF AN INTOXICANT.
- 2. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF-DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS DID WRONGFULLY OPERATE A MOTOR VEHICLE WHILE HER ABILITY TO DO SO WAS IMPAIRED BY AN INTOXICANT.
- 3. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS WAS UNFIT FOR DUTY.
- 4. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF-DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS WAS UNFIT FOR DUTY, WHILE ARMED.
- 5. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF-DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS WRONGFULLY REFUSED TO SUBMIT TO A BREATHALYZER TEST.
- 6. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF-DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS LEFT THE SCENE OF A MOTOR VEHICLE ACCIDENT IN WHICH SHE STRUCK A PEDESTRIAN.
- 7. MOS MEDINA, WHILE ASSIGNED TO THE 90TH PRECINCT, WHILE OFF-DUTY AND WITHIN THE CONFINES OF NEW YORK COUNTY, SAID MOS FAILED TO SAFEGUARD HER FIREARM.

PENALTY: MOS MEDINA WAS PLACED IN DISMISSAL PROBATION FOR ONE (1) YEAR AND SUSPENDED WITHOUT PAY FOR NINETEEN (19) DAYS. IN ADDITION, MOS MEDINA FORFEITED TWENTY-FIVE (25) VACTION DAYS CASE CLOSED ON 4/13/20

## Disclosure # 4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 06/18/2019, AGAINST MOS MEDINA:

1. DRIVER LICENSE SUSP/REVOKED/EXP

CASE CLOSED ON 07/09/2019

ACTION TAKEN: VERBAL INSTRUCTIONS.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County